

IN THE UNITED STATES COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

JENAM TECH, LLC	§	
	§	
VS.	§	CAUSE NO. 4:19-cv-250 [ALM/KPJ]
	§	
SAMSUNG ELECTRONICS CO., LTD. and	§	PATENT CASE
SAMSUNG ELECTRONICS AMERICA, INC.	§	

PLAINTIFF’S UNOPPOSED MOTION TO STAY CASE DEADLINES

On September 27, 2019, Plaintiff Jenam Tech, LLC (“Jenam”) informed Defendants Samsung Electronics America, Inc., (“SEA”) and Samsung Electronics Co., Ltd. (“SEC”) (together “Samsung”) that Jenam will likely be changing counsel, and asked whether Samsung would oppose a 30-day stay of this case. Subsequently, Jenam confirmed that it will be changing counsel and requests the time to identify and procure new counsel, as well as for new counsel to become familiar with the facts and status of this case.

In discussing the issues, the Parties came to agreement on the following terms:

1. If acceptable to the Court, all outstanding dates in this matter will be stayed for thirty (30) days, up to and including October 31, 2019.
2. The proposed deadlines contemplated by Appendix B to the Court’s Order Governing Proceedings for the above referenced matter [Dkt.25], including but not limited to those related to the claim construction process, will be extended by at least 30 days from the dates dictated by operation of Appendix B.
3. Where the Court’s Order Governing Proceedings for the above referenced matter [Dkt.25] provides in pertinent part that “[A]ny motions to transfer shall be filed no later than twenty-one days before the Case Management Conference” (currently scheduled

for October 22, 2019) meaning that such motions would ordinarily be due on October 1, 2019 [*Id.* at p. 2], the deadline for Samsung to file any motion to transfer would be extended for 30 days, to and including October 31, 2019.

4. At the end of the 30-day stay period referenced in item #1 above, on October 31, 2019, parties will provide a status report to the Court with a proposal on a schedule going forward.
5. The Parties request that the Rule 16 Management Conference currently set for October 22, 2019, be rescheduled for a date and time convenient to the Court after the parties provide the status report referenced in item #4 above. Otherwise, the parties will be prepared to discuss the issues at the currently scheduled Rule 16 Management Conference on October 22, 2019.

WHEREFORE, Plaintiff Jenam Tech LLC requests that the Court enter the attached order approving the parties' agreement as set forth above.

Dated: October 1, 2019

Respectfully submitted,

By: /s/

Jeffrey G. Toler
Texas State Bar No. 24011201
Benjamin R. Johnson
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ATTORNEYS FOR PLAINTIFF
JENAM TECH LLC

CERTIFICATE OF CONFERENCE

Plaintiff states that (1) counsel has complied with the meet and confer requirements of Local Rule CV-7(h), and (2) Defendant Samsung is unopposed to the relief sought by this motion.

By: /s/ Jeffrey G. Toler
Jeffrey G. Toler

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel of record who have consented to electronic service as this district requires. Local Rule CV-5(a)(3)(A).

Dated: October 1, 2019

Respectfully submitted,

By: /s/

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**[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION TO STAY CASE DEADLINES**

The Court has considered Plaintiff Jenam Tech, LLC's Unopposed Motion for Extension of Case Deadlines. The Court GRANTS the motion. Accordingly,

1. All outstanding dates in this matter will be stayed for thirty (30) days, up to and including October 31, 2019.
2. The proposed deadlines contemplated by Appendix B to the Court's Order Governing Proceedings for the above referenced matter [Dkt.25], including but not limited to those related to the claim construction process, will be extended by at least 30 days from the dates dictated by operation of Appendix B.
3. The deadline for Samsung to file any motion to transfer will be extended for 30 days, to and including October 31, 2019.
4. At the end of the 30-day stay period referenced in item #1 above, on October 31, 2019, the Parties will provide a status report to the Court with a proposal on a schedule going forward.
5. The Rule 16 Management Conference currently set for October 22, 2019, is hereby rescheduled for _____, 2019 at _____ A.M./P.M.